

FILED

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United States Courts
Southern District of Texas

FILED

May 12, 2023

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: JL
Deputy Clerk

UNITED STATES OF AMERICA**Plaintiff,****v.**

- (1) ROBIN JITTAUN BROOKINS**
- (2) ABEDNEGO DAMON NICHOLS**
- (3) MIRANDA LEJUNE GORE**

Defendants.**Case No: 4:23-CR-00102****INDICTMENT****4:23-mj-1026**

COUNT 1: 8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i) Conspiracy to Transport Illegal Aliens

COUNT 2: 8 U.S.C. § 1324(a)(1)(A)(v)(II)&(b)(1) Transportation of Illegal Aliens, Aiding and Abetting

THE GRAND JURY CHARGES:

COUNT ONE
[8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i)]

On or about April 3, 2023, in the Western District of Texas, Defendants,

- (1) ROBIN JITTAUN BROOKINS**
- (2) ABEDNEGO DAMON NICHOLS, AND**
- (3) MIRANDA LEGUNE GORE**

did knowingly and intentionally combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, certain aliens who had entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact that said aliens had come to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law.

A violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) & (B)(i).

COUNT TWO
[8 U.S.C. § 1324(a)(1)(A)(v)(II) &(b)(1)]

On or about April 3, 2023, in the Western District of Texas, the Defendants,

**(1) ROBIN JITTAUN BROOKINS
(2) ABEDNEGO DAMON NICHOLS, AND
(3) MIRANDA LEGUNE GORE**

aiding and abetting one another, did knowing and in reckless disregard of the fact that certain aliens had come to, entered, and remained in the United States in violation of law, and with the intent to further the alien's unlawful presence in the United States, did transport and move, and attempted to transport and move said aliens, by means of transportation or otherwise in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain.

A violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(II) &(b)(1).

A TRUE BILL.

[REDACTED]
FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY: Dustin Farahnak
DUSTIN FARAHNAK
ASSISTANT UNITED STATES ATTORNEY